



ALL PRO BROADCASTING, INC.

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

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June 16, 2005

DOCKET FILE COPY ORIGINAL

Re: Written *Ex Parte* Submission
MM Docket No. 99-325

ORIGINAL

Dear Ms. Dortch:

All-Pro Broadcasting, Inc. operates two Class A FM broadcast stations in California that are seriously threatened by adjacent-channel interference that will increase significantly when the interfering stations implement digital IBOC operation. The interfering stations are Class B stations that are grandfathered to operate with more power and height than is normally permitted for their class. If they are not required to return to normal class limits when they transmit digital signals, my stations' ability to provide local service to will be damaged.

We operate KCXX(FM), Facility ID 2398, Channel 280A, Lake Arrowhead, California, which is north of San Bernardino, and KATY-FM, Facility ID 267A, Idyllwild, California, which is southwest from Palm Springs. KATY-FM operates first-adjacent to KRTH-FM, Facility ID 28631, Channel 266B, Los Angeles. KRTH-FM would normally be limited to the equivalent of 50 kW at 150 meters above average terrain; but it is grandfathered and operates with 51 kW at 955 meters, approximately 18 dB above the Class B maximum. KCXX operates second-adjacent to both KBIG-FM, Facility ID 6360, Channel 282B, and KOST, Facility ID 34424, Channel 278B, Los Angeles. KBIG-FM and KOST would also normally be limited to 50 kW/150 meters; but KBIG-FM operates with 84 kW at 882 meters, 20 dB above the normal limit, and has an application pending for 65 kW at 929 meters. KOST operates with 12.5 kW at 949 meters, 16 dB above the normal limit. Since only 3 dB constitutes a doubling of power, it is obvious that these two super power stations, at 16-20 dB above the normal limit, exceed the normal limit by a huge amount.

Our stations are not short-spaced to the super power stations; but since those stations are so far above the Class B normal limit, they cause interference to our stations well beyond what we would normally expect based on the Commission's mileage separation requirements. We have lived with this problem, like it or not. However, when the super power stations transmit IBOC digital signals, the digital signals will be intentionally radiated outside the analog signal bandwidth, co-channel to KATY-FM and first-adjacent on both sides to KCXX. Whatever improvements may have been made in consumer radio receivers to reduce susceptibility to second-adjacent channel interference, no receiver can filter out co-channel interference, and few, if any, consumer receivers can filter out first-adjacent interference. Thus we are headed for what looks like a train wreck for our stations while digital and analog services are both in place.

Many years ago, when rural California was undeveloped, service from super power stations from Los Angeles made some sense, to enable outlying populations to receive radio broadcasting service. However, the population of the outlying areas has exploded in the four

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decades since grandfathering was established. These areas now are full of burgeoning communities that need their own broadcast services. That is why stations such as ours have been built and have grown. IBOC operation by super power stations threatens to cut out pieces of the service areas of the new local stations on which so much of the growing California population now depends.

I am attaching maps prepared by an engineering firm I retained, showing what will happen to our stations -- how much worse the interference from Los Angeles will be -- because the interfering contours will jump such a long way in our direction. The KRTH-FM interfering contour, which now reaches over and beyond the KATY-FM transmitter site, will encompass the entire KATY-FM protected primary 60 dBu service area. The KBIG-FM interfering contour will for the first time intrude into the KCXX primary service area.

We do not want to stop the migration of FM radio to digital operation, which we hope and believe can ultimately benefit all stations. However, the kind of interference increase that we anticipate from IBOC operation by super power stations is both frightening and unconscionable. The interference calculations the Commission made when it decided to approve the IBOC signal mask outside the analog FM channel bandwidth do not work when one station operates with super power and the other does not, because the assumptions regarding signal ratios between the two stations are invalid.

Grandfathered super power operation may have had a valid role in the 1960's, but the reasons that existed then to allow so much power to reach rural areas do not exist any more, now that the outlying areas have grown and developed their own communities. It is certainly not justified to saddle new stations in these communities with so much new interference, that will keep them from reaching the audiences they rightfully expect to be able to reach and will deprive much of the public of service from local stations. Small businesses, including our own minority-owned company, will suffer from the out-of-date protection of facilities that super power stations do not need to serve their own communities of license.

I am aware of, and I fully support, the efforts that have been made by The Livingston Radio Company (WHMI-FM, Howell, Michigan) to bring the full scope of the super power IBOC interference problem to the Commission's attention. Small businesses like Livingston's and our own need the Commission's attention and help, so that we can continue to serve our own growing communities. Please do not let us drown in a sea of new interference.

Very truly yours,



Duane Davis

Attachments

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cc: (w/att) Infinity Broadcasting East, Inc. (KRTH-FM)
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Interference from superpower Class "B" stations to outlying FM facilities is expected to increase significantly if the FCC permits superpower digital IBOC signals for these superpower Class "B" stations like those located in areas like Mt. Wilson.

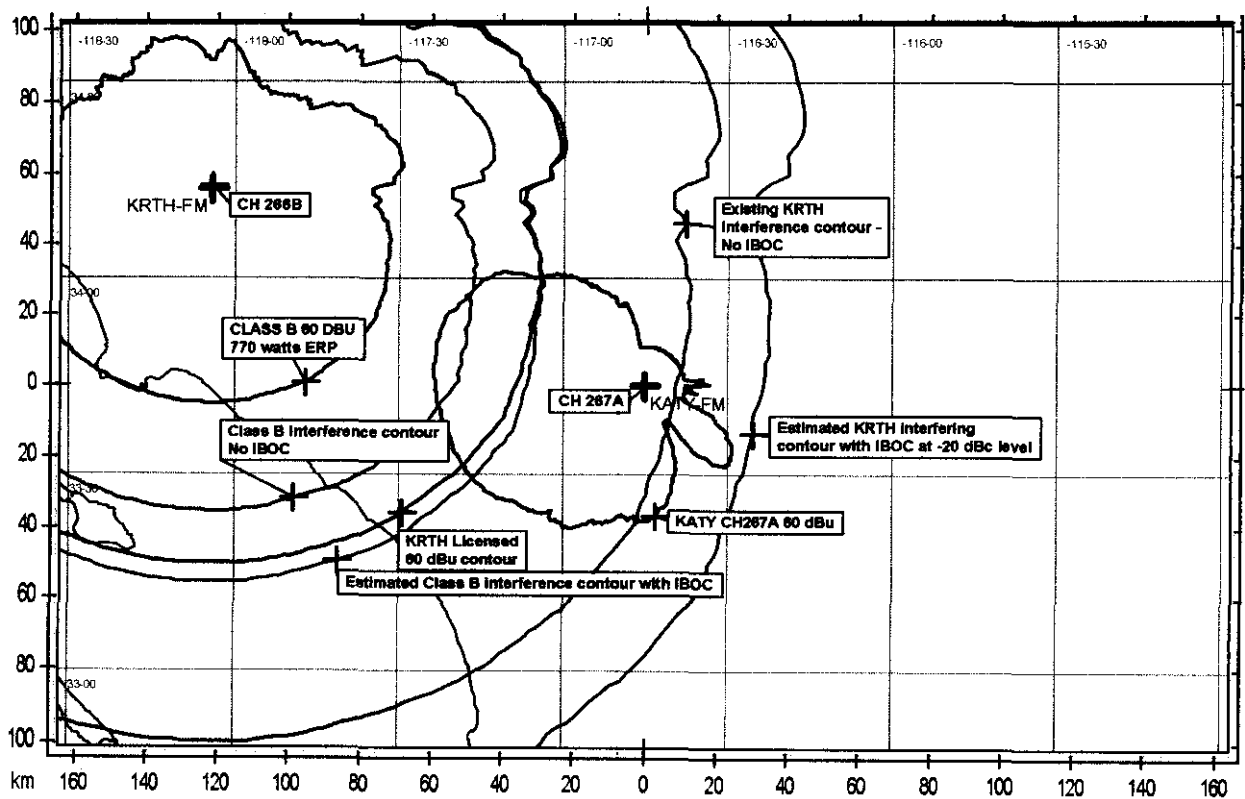
Years ago, small, populated towns and areas were well served by Los Angeles superpower Class "B" facilities, however, those small populated areas have grown into towns and cities with many having their own FM stations. It is logical that local stations can more adequately serve the needs of the community to which they are licensed. Large major market stations quite often do not meet the needs of the smaller outlying communities even though their signal may reach these outlying areas. As outlying FM stations have come into their own, many have had to deal with superpower analog interference. This interference is especially detrimental to weaker signals when heavy inversion layers are prevalent.

Two maps are included with this report showing interference areas present and interference areas expected if superpower digital IBOC powers are permitted. These maps show how damaging FM IBOC will be to two non-short spaced Class "A" FM facilities. Now is the appropriate time to level the playing field for not only for the superpower major market stations but also for the suburban area stations, which may not operate at power levels above those permitted for their class.

First adjacent channel interference is expected when the F(50,10) 48 dBu contour from a hybrid IBOC overlaps the protected 60 dBu F(50,50) contour. Second adjacent channel interference is expected when the F(50,10) 80 dBu contour from a hybrid IBOC overlaps the protected 60 dBu F(50,50) contour.

All Pro Broadcasting, Inc., operates two Los Angeles area outlying FM stations both of which are Class "A". KATY-FM, Channel 267A operates on first adjacent channel to superpower KRTH-FM, Channel 266B. KCXX, Channel 280A operates on second adjacent channel to superpower KBIG-FM, Channel 282B and second adjacent channel to superpower station KOST, Channel 278B. These two class "A" stations have had to cope with analog interference within their protected service contours through their existence. KRTH-FM operates at approximately 18 dB above a maximum class "B" facility, KBIG-Fm at approximately 20 dB above a maximum class "B" and KOST at approximately 16 dB above maximum class "B". Analog interference alone from superpower class "B" stations is problematic, but add superpower digital IBOC and a train wreck is in the making.

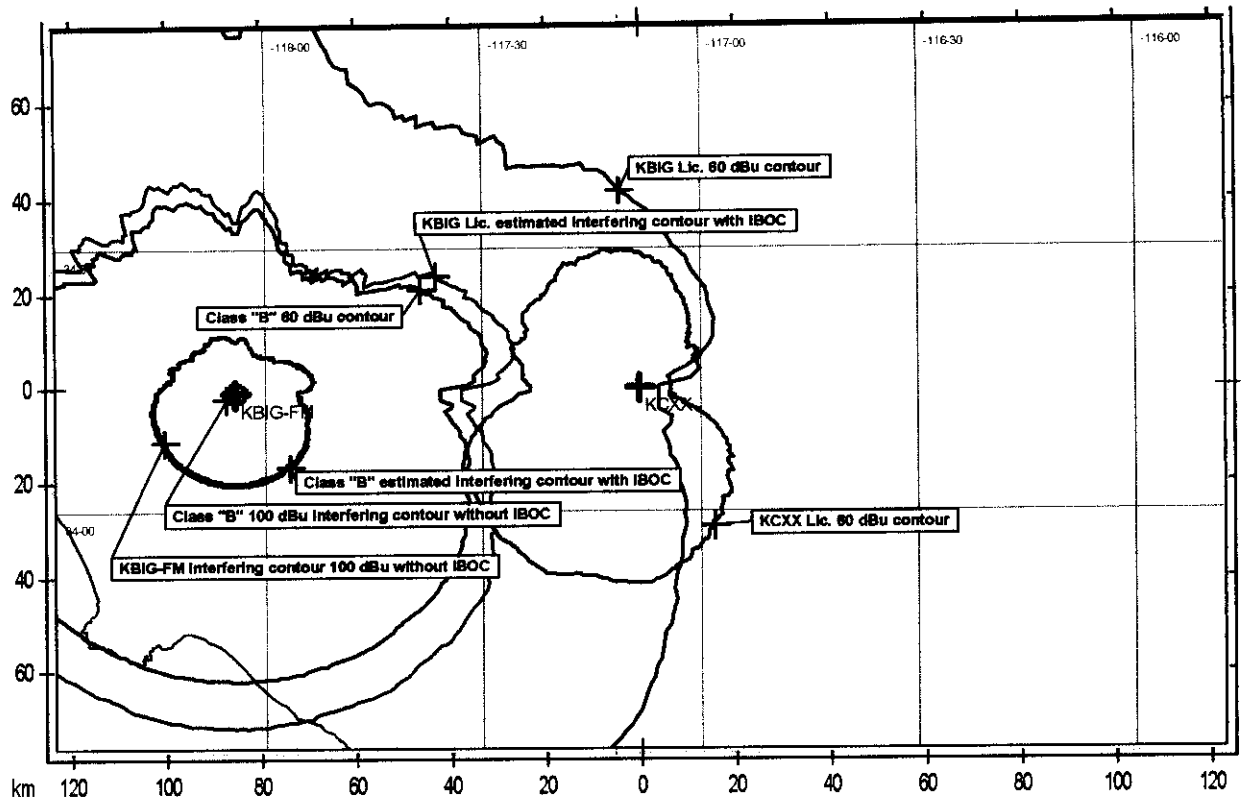
KRTH-FM, CH 266B SUPERPOWER, KATY-FM, CH 267A LICENSED MAX. CLASS "A"



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KBIG-FM CH 282B Superpower, KCXX CH280A maximum class "A"



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